

Michael J. McCrystal, Esquire
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STE 1
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Attorneys for Respondents

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
READING DIVISION

Michael Ulecka and Andrea Ulecka	21-11036
Debtors	RESPONSE TO CERTIFICATION OF DEFAULT
Midland Mortgage	
Movant	
Vs.	
Michael Ulecka and Andrea Ulecka	
Respondents	

Michael J. McCrystal, Esquire, attorney for the Respondents, Michael
and Andrea Ulecka respond to the Certification of Default and aver:

1. Denied, this averment is strictly denied and it is averred that
debtors were at all relevant times current.

Certification of Default

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2 WHEREFORE, Debtors pray this Honorable Court to deny the Certificate
3 of Default and for such and other relief as is just and equitable.

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6 Respectfully submitted,

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8 /s/Michael J. McCrystal

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11 Michael J. McCrystal, Esquire
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Certification of Default